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Attorneys for Chapter 11 Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re:

ICPW Liquidation Corporation, a California
corporation¹,

Debtor and Debtor in Possession.

In re:

ICPW Liquidation Corporation, a Nevada
corporation²,

Debtor and Debtor in Possession.

☒ Affects both Debtors

☐ Affects ICPW Liquidation Corporation, a
California corporation only

☐ Affects ICPW Liquidation Corporation, a
Nevada corporation only

Lead Case No.: 1:17-bk-12408-MB
Jointly administered with:
1:17-bk-12409-MB

Chapter 11 Cases

**DEBTORS' MOTION FOR AUTHORITY
TO PAY UNDISPUTED PRE-PETITION
CLAIMS OF SOLVENT ESTATE AND
ESTABLISHING PROTOCOL AND
NOTICE OF HEARING THEREON**

DATE: December 12, 2017
TIME: 1:30 p.m.
PLACE: Courtroom "303"
21041 Burbank Blvd.
Woodland Hills, CA

¹ Formerly known as Ironclad Performance Wear Corporation, a California corporation.

² Formerly known as Ironclad Performance Wear Corporation, a Nevada corporation.

1 **PLEASE TAKE NOTICE** that a hearing will be held on December 12, 2017, at 1:30
2 p.m., at the above-referenced date and location for the Court to consider the motion (the
3 “Motion”) brought by ICPW Liquidation Corporation, a California corporation, formerly known
4 as Ironclad Performance Wear Corporation, a California corporation (“ICPW California”), and
5 ICPW Liquidation Corporation, a Nevada corporation, formerly known as Ironclad Performance
6 Wear Corporation, a Nevada corporation (“ICPW Nevada” and collectively with ICPW
7 California, the “Debtors”) for authority to pay all outstanding undisputed pre-petition claims or to
8 pay them once resolutions have been reached making them undisputed, with undisputed to mean
9 that both the Debtors and the Official Committee of Equity Holders (the “OCEH”) agree that the
10 claim is to be allowed.
11

12 In order to efficiently manage these chapter 11 cases, at the outset of these cases, the
13 Debtors filed and obtained orders of the Court jointly administering these chapter 11 cases.
14 These bankruptcy cases have for all practical purposes been operated on a consolidated basis.
15 There is one management team and one board of directors for both Debtors. There is one
16 Creditors Committee and one Equity Committee. The Debtors recently consummated a sale of
17 substantially all of their assets. The Escrow Agent is currently holding the sum of
18 \$16,354,050.82 in a Trust Account, all of which is unencumbered and available to be paid to
19 creditors and shareholders. The recently consummated sale of the Debtors’ assets does not
20 allocate the purchase price among the two estates (recognizing of course that all or the vast
21 majority of the assets that were sold were owned by the California entity/operating business).
22

23 The Debtors’ bankruptcy counsel has been maintaining a very detailed master claims chart
24 (the “Claims Chart”) for this case. A copy of that Claims Chart is attached hereto as Exhibit “1”.
25 The Claims Chart contains twelve columns. The far column to the left is the name of the
26 respective creditor. The next column to the right indicates whether the creditor’s claim was filed
27
28

1 or scheduled as a claim against ICPW California, ICPW Nevada or both Debtors. The next four
2 columns to the right pertain to proofs of claim filed by the creditors, including the claim number,
3 the amount of the claim asserted, and the priority of the asserted claim (i.e., secured, priority or
4 general unsecured). The next four columns to the right pertain to the claims that were scheduled
5 by the Debtors, including the amount of scheduled claim, the priority of the scheduled claim (i.e.,
6 secured, priority or general unsecured), and whether the Debtors believe the claim to be
7 contingent, unliquidated or disputed. The next column to the right indicates the amount of a
8 particular claim that was already paid out of the sale proceeds in accordance with Court order.
9 Finally, the column to the far right indicates the amount that each outstanding (or portion thereof)
10 claim would be allowed at if the claim is allowed in the amount scheduled or asserted (meaning
11 that no objection is ever filed to the claim or an objection is filed but the claimant prevails).
12

13
14 As indicated at the bottom of the far right hand column of the Claims Chart, if every
15 single remaining claim was allowed in the amount asserted by the creditor or scheduled by the
16 Debtors, there would be a total of \$2,839,911.78 of remaining outstanding claims to be paid.
17 Even if that occurred, that would still leave a total of \$13,514,139.04 available in these estates to
18 pay the allowed fees and expenses of the professionals with the balance to shareholders.³

19
20 The Debtors intend to file a joint plan of reorganization and disclosure statement together
21 with the OCEH in the very near future, with the expectation that they will confirm their joint plan
22 and hopefully have their confirmed joint plan go effective by the end of the first quarter of 2018.
23 Since it is now crystal clear that all creditors will be paid in full, the Debtors do not see any
24 legitimate basis to forcing creditors whose claims are not disputed by the Debtors or the OCEH to
25 have to wait four months to be paid, which only increases the financial burden on those creditors
26

27 ³ The Debtors actually believe that the final figure will be even higher because the Debtors continue to
28 hold their remaining operating cash as of the sale closing to pay their post-petition bills and believe that
there will likely be some excess remaining cash by the end of these bankruptcy cases.

1 with absolutely no benefit to the Debtors' estates. Forcing these creditors to wait so long to be
2 paid seems like a particularly unjust result in light of the fact that the vast majority of the Debtors'
3 undisputed unsecured debt was paid in full concurrently with the closing of the sale.

4 The Debtors understand from their conversations with the OCEH that the OCEH is fully
5 supportive of the relief requested by the Debtors herein and will be filing a joinder to this Motion.
6 The Debtors therefore respectfully request that the Court exercise its broad judicial powers under
7 Section 105(a) of the Bankruptcy Code to permit the Debtors (with the support of the OCEH) to
8 implement the protocol described below.
9

10 CLAIMS ALLOWANCE PROTOCOL

11 The Debtors request the Court to approve the claims allowance protocol set forth below:⁴

- 12 - If the Debtors and the OCEH agree with the amount and priority of a scheduled or filed
13 claim without any modification, the Debtors and the OCEH will file a joint notice with the
14 Court signed by counsel to both the Debtors and the OCEH advising the Court of the
15 same. Each such notice will identify the name of the creditor, the claim number if it
16 pertains to a proof of claim filed by the creditor, and the amount and priority of the claim
17 that will be deemed allowed. Once that notice has been filed with the Court, the claim
18 will be deemed permanently allowed in that amount and with that priority, and the Escrow
19 Agent will be deemed authorized to pay the allowed claim out of the funds in the Trust
20 Account.
21
22 - If the Debtors and the OCEH are able to reach an agreement with a particular creditor on
23 the amount of a claim which is less than the amount or of a different priority than the
24 scheduled or filed claim, the Debtors and the OCEH will file a joint stipulation signed by
25
26

27 ⁴ If the Court grants this Motion, the order of the Court granting this Motion will be clear to make sure that
28 it does not conflict with the sale order in terms of the ability of the Escrow Agent to make these
distributions to creditors out of the funds in the Trust Account.

1 the Debtors, the OCEH and the creditor advising the Court of the same. Each such
2 stipulation will identify the name of the creditor, the claim number if it pertains to a proof
3 of claim filed by the creditor, and the amount and priority of the claim that will be deemed
4 allowed. Once that stipulation has been filed with the Court, the claim will be deemed
5 permanently allowed in that amount and with that priority without the need for any Court
6 order, and the Escrow Agent will be deemed authorized to pay the allowed claim out of
7 the funds in the Trust Account.
8

9 **PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested in this
10 Motion must (1) be filed with the Clerk of the Court and be served on the respective professional
11 no later than November 28, 2017 and (2) be in the form required by Local Bankruptcy Rule 9013-
12 1(f).
13

14 **PLEASE TAKE FURTHER NOTICE** that the Court may deem the failure of any party
15 in interest to file a timely objection to this Motion to constitute consent to the relief requested in
16 this Motion.

17 WHEREFORE, the Debtors respectfully request the authority of the Court to permit the
18 Debtors to pay any remaining undisputed pre-petition claims if approved by both the Debtors and
19 the OCEH in accordance with the Claims Allowance Protocol outlined above.
20

21 Dated: November 21, 2017

LEVENE, NEALE, BENDER, YOO & BRILL
L.L.P.

22
23 By: /s/ Ron Bender

24 RON BENDER
25 MONICA Y. KIM
26 KRIKOR J. MESHEFEJIAN
27 LEVENE, NEALE, BENDER, YOO
& BRILL L.L.P.
Attorneys for Chapter 11 Debtors and
Debtors in Possession
28

EXHIBIT “1”

		Case 1:17-bk-12408-MB Doc 241 Filed 11/21/17 Main Document Page 7 of 28				Entered 11/21/17 14:40:10 Desc SCHEDULED CLAIM				PAID AMOUNT	REMAINING CLAIM (worst case scenario)
Creditor	Case in Which Claim Filed/Scheduled	Claim Nos.	Secured	Priority	General Unsecured	Schedule "D" Secured	Schedule "E" Priority	Schedule "F" Unsecured	C/U/D		
1920 Hutton Court	NV							\$13,257.09		\$13,257.09	\$0.00
Account Temps	CA							\$5,662.28		\$0.00	\$5,662.28
Advantage Media Services	CA	4	\$178,522.75					\$178,522.75		\$178,522.75	\$0.00
American Alternative Insurance Corporation	CA	1			\$400,000.00					\$0.00	\$400,000.00
AML United Limited	CA							\$28,330.56		\$28,330.56	\$0.00
Amster, Rothstein & Ebenstein, LLP	CA	11			\$11,395.96			\$11,395.96		\$0.00	\$11,395.96
Atmos Energy	CA							\$51.98		\$0.00	\$51.98
BDO USA, LLP	CA							\$45,000.00		\$0.00	\$45,000.00
Ben Padnos	CA							\$1,304.35		\$0.00	\$1,304.35
BIC ALLIANCE	CA							\$5,800.00		\$0.00	\$5,800.00
BNSF	CA	15			\$14,788.95			\$14,788.95		\$0.00	\$14,788.95
Broadridge	CA							\$2,110.51		\$0.00	\$2,110.51
Broussard,Ronald Roy	CA							\$40,000.00		\$40,000.00	\$0.00
Burkhard,Kerri	CA							\$2,500.00		\$2,500.00	\$0.00
Business Systems Integrators, LLC	CA							\$695.00		\$0.00	\$695.00
California Board of Equalization	CA						\$600.00	\$291.40		\$0.00	\$891.40
Capital One Bank	CA							\$15,471.81		\$0.00	\$15,471.81
Chang Bang Gloves (Hong Kong) Co., Limited	CA/NV	17,6			\$1,410,219.16			\$1,228,307.56		\$1,228,307.56	\$181,911.60
Charles Giffen	CA							\$4,402.17		\$0.00	\$4,402.17
CIS Custom Information Services	CA							\$3,546.45		\$0.00	\$3,546.45
Commerce Technologies, Inc.	CA							\$288.10		\$0.00	\$288.10
Comptroller of Public Accounts	CA						\$2,294.00			\$0.00	\$2,294.00
CRG Financial LLC	CA	18			\$11,135.00					\$0.00	\$11,135.00
Custom Information Sevices	NV	5			\$3,546.45					\$0.00	\$3,546.45
David Jacobs	CA							\$5,706.52		\$0.00	\$5,706.52
Daylight Transport	CA							\$355.09		\$0.00	\$355.09
DESIGN GALLERY (PVT.) LTD.	CA							\$12,801.60		\$12,801.60	\$0.00
DESUN GARMENTS, LTD.	CA							\$7,691.75		\$7,691.75	\$0.00
Dival Safety & Supplies	CA							\$2,095.00		\$0.00	\$2,095.00
DRG Strategic, LLC - Bob Goldstein	CA							\$556.75		\$0.00	\$556.75
DTM Sales	CA							\$3,184.26		\$0.00	\$3,184.26
Emmett Murphy	CA							\$1,304.35		\$0.00	\$1,304.35
Emslie, Mike	CA							\$35,000.00		\$35,000.00	\$0.00
Eshleman,Derek G	CA							\$20,000.00		\$20,000.00	\$0.00
Federal Insurance Company	NV	3			\$14,385.50					\$0.00	\$14,385.50
FedEx	CA	24			\$18,551.03			\$14,795.67		\$0.00	\$18,551.03
Feld,Abraham Hagen	CA							\$5,000.00		\$5,000.00	\$0.00
Fowler,Michael J	CA							\$40,000.00		\$40,000.00	\$0.00
Geoff Greulich	CA							\$147,500.00		\$147,500.00	\$0.00
Ginger Collier	CA							\$797.81		\$0.00	\$797.81
GT Graphics of Sheboygan LLC	CA, NV	10, 4			\$759.07			\$759.07		\$0.00	\$759.07
Guo, Xin	CA							\$10,000.00		\$10,000.00	\$0.00
Hewlett Packard	CA							\$364.80		\$0.00	\$364.80
Internal Revenue Service	CA	6	\$0.00	\$0.00	\$0.00					\$0.00	\$0.00
Internal Revenue Service	NV	2		\$2,000.00						\$0.00	\$2,000.00

		Case 1:17-bk-12408-MB Doc 241 Filed 11/21/17 Entered 11/21/17 14:40:10 Desc Main Document Page 8 of 28				SCHEDULED CLAIM				PAID AMOUNT	REMAINING CLAIM (worst case scenario)
Creditor	Case in Which Claim Filed/Scheduled	Claim Nos.	Secured	Priority	General Unsecured	Schedule "D" Secured	Schedule "E" Priority	Schedule "F" Unsecured	C/U/D		
IPFS Corporation	CA	3	\$30,725.49							\$0.00	\$30,725.49
Jaeger,Eric	CA							\$40,000.00		\$40,000.00	\$0.00
Jeffrey Cordes	CA	8		\$12,850.00	\$154,056.75					\$0.00	\$166,906.75
KA HUNG GLOVE INUSTRIAL CO. LTD.	CA							\$38,934.90		\$38,934.90	\$0.00
Konica Minolta Business Solutions	CA							\$1,152.31		\$1,152.31	\$0.00
LAB Sales Agency	CA							\$54.92		\$0.00	\$54.92
Laubert,Matthew Palmer	CA							\$10,000.00		\$10,000.00	\$0.00
LF Logistics	CA							\$69.10		\$0.00	\$69.10
Liaison Technologies, Inc.	CA	23			\$945.00			\$945.00		\$0.00	\$945.00
Lien Shun Yang Leather Co., Ltd.	CA							\$34.59		\$0.00	\$34.59
Marshall, Russell	CA							\$5,000.00		\$5,000.00	\$0.00
MARUSAN - MIMASU TSHUSHO CO. LTD.	CA							\$382,811.28		\$382,811.28	\$0.00
Matt Pliskin	CA							\$27,000.00		\$27,000.00	\$0.00
Mediant	CA							\$253.09		\$0.00	\$253.09
MERCINDO GLOBAL MANUFAKTUR	CA							\$444,674.64		\$444,674.64	\$0.00
Metzler,Stacy Marie	CA							\$7,500.00		\$7,500.00	\$0.00
Michael DiGregorio	CA							\$6,847.83		\$0.00	\$6,847.83
Morris,Chartrice Holt	CA							\$7,500.00		\$7,500.00	\$0.00
Nacion,Markham	CA							\$18,000.00		\$18,000.00	\$0.00
National Safety Council	CA							\$395.00		\$0.00	\$395.00
nChannel, Inc.	CA							\$0.00		\$0.00	\$0.00
Net Pack	CA							\$3,554.60		\$0.00	\$3,554.60
Office Depot Acct 31A	CA							\$317.44		\$0.00	\$317.44
Pacific Stock Transfer Company	CA							\$958.00		\$0.00	\$958.00
Perry HVAC	CA							\$1,264.09		\$0.00	\$1,264.09
Pestilli & Associates	CA							\$157.46		\$0.00	\$157.46
Pitney Bowes Credit Corp.	CA							\$452.99		\$452.99	\$0.00
Precision Testing Laboratories	CA							\$1,500.00		\$0.00	\$1,500.00
Progroup Incorporated	CA	22			\$1,000.00			\$500.00		\$0.00	\$1,000.00
PT JJ GLOVES INDO	CA							\$162,917.76		\$162,917.76	\$0.00
PT SEOK HWA INDONESIA	CA							\$13,174.86		\$13,174.86	\$0.00
PT SPORT GLOVE INDONESIA	CA							\$144,238.66		\$144,238.66	\$0.00
Quill Corporation	CA							\$67.46		\$0.00	\$67.46
Radians Wareham Holding, Inc.	CA, NV	20, 7	\$3,464,093.28			\$3,397,406.95				\$5,343,988.19	\$0.00
Republic Services	CA							\$341.10		\$0.00	\$341.10
Resources Global Professionals	NV, CA	1			\$80,767.00			\$80,727.00		\$0.00	\$80,767.00
Risk Consulting Partners	CA							\$0.00		\$0.00	\$0.00
Robert Steckler	CA							\$1,304.35		\$0.00	\$1,304.35
Russ McDonald	CA							\$98.65		\$0.00	\$98.65
Safeco Building Maintenance	CA							\$646.35		\$0.00	\$646.35
Shur-Sales & Marketing, Inc.	CA							\$16,125.00		\$0.00	\$16,125.00
Skadden Arps Slate Meagher & Flom LLP	CA	21			\$342,141.79			\$231,848.92		\$0.00	\$342,141.79
SPS Commerce	CA							\$1,022.55		\$0.00	\$1,022.55
Stubbs, Alderton & Markiles, LLP	CA							\$317,460.41		\$0.00	\$317,460.41
Superior Printing, Inc.	CA							\$162.23		\$0.00	\$162.23
Synetra	CA							37,972.33		\$37,972.33	\$0.00

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Creditor	Case in Which Claim Filed/Scheduled	Claim Nos.	Secured	Priority	General Unsecured	Schedule "D" Secured	Schedule "E" Priority	Schedule "F" Unsecured	C/U/D		
TAB Sales Soulutions	CA							\$430.52		\$0.00	\$430.52
Tamer Shiha	CA							\$12,500.00		\$12,500.00	\$0.00
Three Part Advisors, LLC	CA	2			\$6,900.00			\$6,900.00		\$0.00	\$6,900.00
Three Part Advisors, LLC	CA	5			\$6,900.00					\$0.00	\$6,900.00
TRI/AUSTIN, INC	CA							\$350.00		\$0.00	\$350.00
TXU Energy	CA	9			\$1,752.73			\$1,430.11		\$0.00	\$1,752.73
Tyco Integrated Security, LLC	CA							\$279.06		\$0.00	\$279.06
Uline	CA							\$710.49		\$0.00	\$710.49
University of Milwaukee	CA							\$33,333.00		\$0.00	\$33,333.00
UPS Freight	CA							\$504.55		\$0.00	\$504.55
Urena,Daniel	CA							\$7,500.00		\$7,500.00	\$0.00
Vane Clayton	CA							\$7,630.43		\$0.00	\$7,630.43
Vonalman,Turner J	CA							\$10,000.00		\$10,000.00	\$0.00
W.W. Grainger. Inc.	CA	19			\$963,708.03					\$180,000.00	\$783,708.03
Washington,Cheryl	CA	13			\$10,000.00			\$10,000.00		\$10,000.00	\$0.00
Weispfenning,Daniel Walton	CA							\$2,500.00		\$2,500.00	\$0.00
Werner Logistics	CA							\$7,375.00		\$0.00	\$7,375.00
William M. Aisenberg	CA	7		\$12,850.00	\$116,556.75					\$0.00	\$129,406.75
Windstream	CA	14			\$1,739.59			\$1,739.59		\$0.00	\$1,739.59
WINSPEED SPORTS SHANGHAI CO., LTD.	CA	12			\$152,830.45			\$144,198.43		\$152,830.45	\$0.00
WONEEL MIDAS LEATHERS	CA	16			\$896,382.28			\$785,358.50		\$785,358.50	\$111,023.78
Yellow and Roadway	CA							\$12,391.41		\$0.00	\$12,391.41
		TOTALS:	\$3,673,341.52	\$27,700.00	\$4,620,461.49	\$3,397,406.95	\$2,894.00	\$4,962,755.55		\$9,614,918.18	\$2,839,911.78

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **DEBTORS' MOTION FOR AUTHORITY TO PAY UNDISPUTED PRE-PETITION CLAIMS OF SOLVENT ESTATE AND ESTABLISHING PROTOCOL AND NOTICE OF HEARING THEREON** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 21, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shiva D Beck sbeck@gardere.com, jcharrison@gardere.com
- Ron Bender rb@lnbyb.com
- Cathrine M Castaldi ccastaldi@brownrudnick.com
- Russell Clementson russell.clementson@usdoj.gov
- Aaron S Craig acraig@kslaw.com, lperry@kslaw.com
- Matthew A Gold courts@argopartners.net
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforruptcy.com
- Jeffrey A Krieger jkrieger@ggfirm.com, kwoodson@greenbergglusker.com; calendar@greenbergglusker.com; jking@greenbergglusker.com
- Samuel R Maizel samuel.maizel@dentons.com, alicia.aguilar@dentons.com; docket.general.lit.LOS@dentons.com; tania.moyron@dentons.com; kathryn.howard@dentons.com
- Krikor J Meshefejian kjm@lnbrb.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpreion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

2. SERVED BY UNITED STATES MAIL: On **November 21, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 21, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

1 **Served via Attorney Service**

Hon. Martin R. Barash
2 United States Bankruptcy Court
21041 Burbank Boulevard, Suite 342
3 Woodland Hills, CA 91367

4 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
true and correct.

5 November 21, 2017	Stephanie Reichert	/s/ Stephanie Reichert
6 <i>Date</i>	<i>Type Name</i>	<i>Signature</i>

Creditors Committee:

Committee Counsel

Brown Rudnick LLP
Attn: Cathrine M Castaldi
2211 Michelson Dr 7th Fl
Irvine, CA 92612

Resources Global Professionals
c/o Brent Waters
17101 Armstrong Ave
Irvine, CA 92614

Winspeed Sports (Shanghai) Co., LTD
c/o Brian Mitteldorf
Creditors Adjustment Bureau
14226 Ventura Blvd.
Sherman Oaks, CA 91423

PT Sport Glove Indonesia
c/o Mark C. Robba
Kranon Desa Pandowoharjo
Sleman Yogyakarta 55512
Indonesia

Equity Committee:

Equity Committee Counsel

Dentons US LLP
Attn: Samuel Maizel & Tania Moyron
601 South Figueroa St., Suite 2500
Los Angeles, CA 90017-5704

Patrick W O'Brien
301 Whitmore Lane
Lake Forrest, IL 60045-4707

Ronald Chez
1524 N. Astor Street
Chicago, IL 60610

Scott Jarus
938 Duncan Avenue
Manhattan Beach, CA 90266

Ironclad Performance Wear (8300)
Shareholders

DANIEL SHELLEY WARD FAMILY
TRUST DTD 12-22-99

THE ELLEN IDELSON TRUST DATED
MARCH 20 2003
710 BROOKTREE ROAD
PACIFIC PALISADES, CA 90272

ETHAN AISENBERG
3900 LEGACY TRAIL CIR
CARROLLTON, TX 75010

WILLIAM AISENBERG
3900 LEGACY TRAIL CIR
CARROLLTON, TX 75010

GREG AKSELTRUD
C/O STUBBS ALDERTON &
MARKILES LLP
15260 VENTURA BLVD 20TH FL
SHERMAN OAKS, CA 91403

GREGORY AKSELTRUD
15260 VENTURA BLVD
20TH FL
SHERMAN OAKS, CA 91403

SCOTT ALDERTON
19687 LOS ALIMOS ST
CHATSWORTH, CA 91311

ELI ARRIV
4340 COLETA RD
AGOURA, CA 91301

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Case 1:17-bk-12408-MB

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